

Wisconsin Shares Child Care Policy and Process Handbook

Chapter 3 EBT Payments

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Division of Early Care and Education

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Acronyms

BPI - Bureau of Program Integrity

BRITS - Benefit Recovery Investigation Tracking System

BV – Benefit Recovery

CARES - Client Assistance for Re-employment and Economic Support

CC - Child Care

CCR&Rs - Child Care Resources and Referral Agencies

CSAW - Child Care Statewide Administration on the Web

CWW - CARES Worker Web

DCF - Department of Children and Families

EBT - Electronic Benefit Transfer

FIS - Fidelity Information Services

IPV – Intentional Program Violation

IVR - Interactive Voice Response

MECA – Milwaukee Early Care Administration

MilES - Milwaukee Enrollment Services

OLC - Office of Legal Counsel

PLBC - Post Load Benefit Correction

PIN - Personal Identification Number

POS - Point of Sale Device

RFA – Request for Assistance

WI - Wisconsin

Purpose

This chapter focuses on MyWIChildCare policies and procedures as it relates to the proper administration of the Wisconsin Shares Child Care Subsidy Program. Much of the chapter focuses on how parents and providers can accomplish various tasks; however, it is vital that agencies have this information in order to answer questions as they arise from Wisconsin Shares participants. Thus, this chapter serves as a centralized location for MyWIChildCare-related payment procedures, and contains information that has been communicated to parents and providers.

3.1 MyWIChildCare Overview

The <u>MyWIChildCare</u> initiative modernized how parents participating in the Wisconsin Shares Child Care Subsidy Program pay for child care by utilizing an electronic benefit transfer (EBT) card, which is managed by <u>Fidelity National Information Services</u> (FIS).

MyWIChildCare supports a payment structure similar to that of private pay parents. Eligible parents are issued a MyWIChildCare EBT card that has their approved child care subsidy loaded onto it monthly. Under the MyWIChildCare payment model, parents are responsible for planning and scheduling child care payments to their provider in accordance with a written payment agreement that is between the provider and the parent (see Administrative Rule DCF 201.038 (5)).

Benefits of MyWIChildCare include:

- 1. Expanded parental responsibility for payments to providers, including the ability to pay in advance for services
- 2. Increased speed of payment to providers by parents
- 3. Increased access to information for both parents and providers
- 4. Parents are empowered to directly engage their provider regarding the cost of care
- 5. Simplified payment and billing process

3.1.1 Overview of Process

Below is a diagram that demonstrates the workflow from determining parent eligibility to the payment of providers by parents. This overview describes the steps necessary to be completed by local agency workers and parents in order to successfully participate in MyWIChildCare.

- 1. The parent applies for Wisconsin Shares Child Care and is determined eligible.
- 2. The Child Care worker and parent determine the family's child care needs.
- 3. The parent identifies the provider (or providers), and provider location(s) that will care for the child(ren) (see provider requirements in <u>Section 2.1</u>).
- 4. The local agency worker enters the parent's approved activity schedule and the child's child care need schedule into CSAW and selects the provider location.
- 5. An authorization is created and provided to the parent, and notices are sent to both the parent and the provider.
- 6. FIS mails the EBT card to the parent.
- 7. The parent activates the EBT card and selects a PIN.
- 8. For new authorizations, DCF sends the subsidy amount to the EBT vendor (FIS) to load to the parent's EBT card the next day. For ongoing authorizations, funds are loaded on the first of each month.
- 9. The parent uses the EBT card to initiate the child care payment(s) to their selected child care provider(s). Proof of the transaction is immediate.
- 10. FIS issues payment transactions directly to the provider(s)' bank account within two to three banking business days.

3.2 MyWIChildCare EBT Card

3.2.1 How EBT Works

The MyWIChildCare EBT card uses Electronic Benefit Transfer (EBT) technology to electronically transfer subsidy funds from a parent's subsidy account to their child care provider as payment for child care services (see Administrative Rule DCF 201.02(9))). Fidelity National Information Services (FIS) is the current EBT card vendor for the Wisconsin Shares Child Care Subsidy Program.

The parent is issued a MyWIChildCare EBT card by FIS to access their child care subsidy funds and pay their provider by phone, Internet, or point-of-sale (POS) device.

The MyWIChildCare EBT card is mailed to the parent on a card mailer which takes approximately one week to arrive in the mail.

During the one-week time period that the parent is waiting to receive their MyWIChildCare EBT card, the parent and provider should discuss the provider's payment policies and verify that the authorization was created for the correct provider and correct provider location (see Section 3.4.2.3). Funds will be loaded to the card per the authorization start and end date of the child(ren)'s authorizations; such dates can be confirmed via the Child Care Provider Portal.

The MyWIChildCare EBT card mailer provides the parent with information including:

- Subsidy issuance dates
- How to activate the EBT card
- How to use the EBT card
- How to protect the EBT card from being lost, stolen, or damaged
- MyWIChildCare EBT card customer service phone number (1-877-201-7601)

The primary parent on the case will receive the EBT card. One EBT card will be issued per family. Multiple authorizations for multiple children can be maintained on one MyWIChildCare EBT card.

A new EBT card will not be reissued for a parent returning to Wisconsin Shares after a period of ineligibility. This same EBT card will be registered for the parent if a new authorization is granted and the existing EBT card has not been reported as lost or stolen.

If a local agency worker anticipates that eligibility or an authorization will be granted soon, advise the parent not to lose or throw away their EBT card. If the EBT card is lost, the parent may contact their local agency, or FIS Customer Service (1-877-201-7601) to order a replacement card.

3.2.2 Selecting a Personal Identification Number (PIN)

Prior to making payment to a provider, the parent must select a four-digit Personal Identification Number (PIN). The PIN is used with the MyWIChildCare EBT card as an

electronic signature. The EBT system cannot process and approve a transaction without the correct PIN entry.

Two options are available for MyWIChildCare EBT card activation and PIN creation:

- Call 1-877-201-7601 or
- Log in to www.ebtEDGE.com
 - Additional information on selecting a PIN is available at: http://paymenttraining.articulate-online.com/p/6342043222

The parent will be asked for the last four digits of their Social Security Number in order to activate their EBT card. If the parent does not have a Social Security Number, the parent will be directed to contact their local agency. The local agency should supply the parent with the parent's PIN number from Cares Worker Web (CWW) to enter in lieu of the parent's Social Security Number.

Child Care providers are prohibited from requiring a parent to provide their EBT card, account number, subsidy account balance, or PIN (see Administrative Rule DCF
201.038 (7)). Parents are encouraged to report instances of a provider requiring access or information regarding their EBT card to their local agency.

3.2.2.1 Updating a PIN

If the parent believes their PIN has been compromised, or if the parent has forgotten their PIN, the parent should immediately contact FIS to update their information. The parent may either call 1-877-201-7601 or log in to ebtEDGE.com to receive step-by-step directions on changing their PIN.

Note: If a local agency suspects that a provider is in possession of a parent's MyWIChildCare EBT card, or has compromised a parent's PIN, the local agency should reset the parent's PIN by contacting the Bureau of Program Integrity (BPI) through the online BPI Technical Assistance form at: https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form. The local agency must then notify the parent that they will need to create a new PIN.

3.2.2.2 Locking a PIN

If a PIN is entered incorrectly four consecutive times, FIS will suspend EBT card access until 12:01 a.m. Central time the next day. A lock notification will appear on the device from which the parent is entering the PIN. Advise the parent to call FIS Customer Services at 1-877-201-7601 for assistance so that the parent will not lose access to the subsidy funds for the rest of the day, or wait until midnight when the lock is automatically removed.

3.2.3 Subsidy Availability

Subsidy issued to a parent's EBT card **for new authorizations** will be available on the day after the authorization is issued.

Subsidy issued to a parent's EBT card **for ongoing authorizations** will be available on the first day of each month.

3.2.4 MyWIChildCare Information for Local Agency Staff

MyWIChildCare EBT card information and transaction data can be found in CSAW. Please see the CSAW Authorizations User Guide for additional details on each screen.

If a parent's EBT card does not arrive in the mail it may be that an authorization was not issued, the address was incorrect (undeliverable card), or that there was an error with the provider. Steps for workers to take for each process are described below:

- 1. Verify that the authorization was processed in CSAW. If it was processed, proceed to Step 2. If the authorization is pending, inform the parent of the necessary steps to complete in order to process the authorization.
- 2. Locate the Case/Card Details page on the side bar in CSAW, and open the Case/Card Details page.
- 3. Select the Replace/Reissue Card page. This page documents whether or not an EBT card has been listed as undeliverable.
 - a. If the EBT card is listed as undeliverable, this means that the EBT card has been returned to FIS as undeliverable mail.
 - i. Verify the correct address with the parent, and select the send again button on the Replace/Reissue Card page.
 - Note: This will only work if the address has been updated in CWW.
 - b. If the EBT card is listed as delivered, verify the address listed on the account with the parent. If it is correct, verify that the selected provider has an FIS contract on the Data Exchange page in CSAW. If all of the above information is correct, direct the parent to contact FIS.
 - i. If the address is incorrect, correct the address and select the send again button on the Replace/Reissue Card page.

If the authorization was not processed and is listed as pending, please refer to the Wisconsin Shares <u>CSAW Authorizations User Guide</u>.

3.3 Payment Procedures

3.3.1 Prior to First Payment

Parents should verify that their child has been authorized to the correct provider and the correct provider location prior to issuing the first payment. Parents may verify the authorization by:

Checking the <u>MyWIChildCare Parent Portal</u> (https://MyWIChildCareparents.wisconsin.gov). This website contains information regarding the authorized hours, subsidy amount, and provider location. If a parent is unable to access information on the Parent Portal, they should speak with their selected provider and verify that their child is authorized for that provider location. For provider verification processes, see Section 3.4.2.3.

- 2. Using ebtEDGE.com, a website operated by FIS that documents parent's transaction information.
- 3. Asking their provider: If the provider reports to the parent that the child is not authorized to their location, the parent should call their local agency.
- 4. Verifying information on the authorization notice.

Note: If an authorization was created to the incorrect provider, see <u>Section 2.4.9</u> for policy on changing or ending an authorization mid-month. If a payment has already been issued to the incorrect provider, or incorrect provider location number, an overpayment or adjustment may be assessed. See <u>Section 4.5</u> for details.

3.3.1.1 How to Check Account Balances

Parents may check their account balances either online, by telephone, or by swiping their MyWIChildCare card at their provider's POS terminal.

3.3.1.1.1 How to Check an Account Balance by Telephone

Parents may call the MyWIChildCare EBT Card Customer Services at 1-877-201-7601 which is available 24 hours a day, seven days a week. Parents can follow the automated instructions to check the account balance.

3.3.1.1.2 How to Check an Account Balance Online

Parents may log in to the MyWIChildCare Parent Portal at https://mywichildcareparents.wisconsin.gov and select the *My Account* button. The account balance is located in the far right hand column under the "Balance" tab.

3.3.1.1.3 How to Check an Account Balance through a POS Device

Parents may swipe their EBT card at the POS device located at their provider's facility (if available). Parents may enter their PIN, and select "Balance Inquiry".

Note: Providers are prohibited from completing this process for the parent. The provider may assist the parent; however, per confidentiality rules in Administrative Rule <u>DCF 201.038 (7)</u>, providers **may not require** a parent to provide the parents EBT card, account number, or PIN. Providers are also prohibited from requiring a parent to disclose the balance in the parent's subsidy account (see Administrative Rule <u>DCF 201.038 (7) (a)</u>).

3.3.1.2 Payment to Providers Options

Parents are responsible for issuing payments to their provider(s). There are three ways a parent may issue payment to their provider. The payment procedures listed below are to be completed by the parents. Local agency workers should know the payment process in case a parent calls for assistance. The payment procedure itself should always be completed by the parent and not by a local agency worker or provider.

Note: A <u>Parent Tutorial (http://paymenttraining.articulate-online.com/p/6342043222)</u> has been created with instructions for parents on how to complete the necessary steps for each type of payment transaction.

3.3.1.2.1 Online Payments

Parents can go to www.ebtEDGE.com and select "Cardholder Login" to make a payment to their provider. Parents can access the website via a desktop computer, tablet, or mobile phone to make a payment or review payments. The parent can log in to the website using their card number and password. The username is the 16-digit MyWIChildCare EBT card number, and the password will be the parent's PIN. The parent will then be able to view information regarding their child(ren)'s authorization(s), including the number of authorized hours and the authorized provider(s).

In order to pay their provider, the parent must select which of their authorized children they would like to submit payment for, which provider location should receive the payment (if more than one), and the amount of the payment. Each authorized child on the case and/or provider and/or provider location will require a separate transaction. The provider will be identified only by the provider's FIS Identification Number. The Parent Portal can be used to confirm if the correct provider has been authorized. At the conclusion of this process, the parent will receive a confirmation number that they should keep in case of payment disputes.

Note: A <u>Parent Portal Tutorial</u> (<u>https://dcf.wisconsin.gov/elearning/mwcc-parentportal/story_html5.html</u>) contains information for parents on the Parent Portal functions, and provides instructions on how to make payments using the Parent Portal.

Online Payment Procedure (ebtEDGE)

- 1. Log in to www.ebtEDGE.com and select the Cardholder Login.
- 2. Enter the 16-digit MyWIChildCare EBT card number and PIN.
- 3. Click "Child Care Payment Transfer".
- 4. Select the child and the provider's ID number.
- 5. Enter the amount to pay the provider.
- 6. Verify that the payment amount displayed is correct.
- 7. Enter the PIN and press enter.
- 8. Print the confirmation page or write down the child, provider, tracking number, the amount of the payment, and the date and the time that the payment was made for record keeping purposes.

3.3.1.2.2 Telephone Payments

Parents may utilize the telephone-based Interactive Voice Response (IVR) system to make a payment to their provider by calling 1-877-201-7601. The phone number is also located on the back of the parent's MyWIChildCare EBT card.

The parent will be prompted to enter their MyWIChildCare EBT card number and PIN. The parent should continue to follow the instructions on the phone. Each authorized child and/or provider and/or provider location will require a separate payment transaction. The provider will only be identified by the provider's FIS Identification Number. At the conclusion of this process, the parent will receive a confirmation number that should be maintained in case of payment disputes.

Telephone Payment Procedure

- 1. Call 1-877-201-7601.
- 2. Enter the 16-digit card number found on the front of the MyWIChildCare EBT card and the PIN.
- 3. Listen to the balance, and then select "Child Care."
- 4. Select "transfer funds to your child care provider."
- 5. When prompted, choose the child by their Child ID number.
- 6. Choose the Provider's ID number.
- 7. Enter the child care subsidy payment amount to transfer to the provider, if correct, press 1.
- 8. Write down the child, provider, tracking number, the amount of the payment, and the date and time the payment was made.

3.3.1.2.3 POS Payment

Parents can use the POS terminal at their provider's location (if available) to issue payments to their provider. This terminal functions similarly to a credit card machine. However, the MyWIChildCare EBT card will only operate on POS terminals provided by the EBT vendor. Any third party POS terminals will not be able to process MyWIChildCare EBT card payments.

To complete a payment via the POS device, the parent must swipe their EBT card and enter their PIN. Next, the parent must select the child for whom they would like to issue payment. The parent will enter the amount to be paid to the provider. If the funds are available, a receipt will print out for both the parent and the provider. Both parties should maintain their respective receipts for their records in the event of payment disputes.

POS Payment Procedure

- 1. Swipe the EBT card through the POS terminal.
- 2. Enter PIN.
- 3. Choose a child from the screen.
- 4. Enter the amount of the child care payment.
- 5. Obtain a receipt from the provider. The receipt will not show the account balance, however, the parent may complete a balance inquiry on the POS terminal.

Note: Parents and providers are responsible for handling any payment disputes. The local agency will take no role in the dispute process. See Section 3.3.1.5 for additional details.

3.3.1.3 Expiration of Funds

Any remaining balance for a month, if not utilized, will be carried over to the following month. Funds are used in a last-in, first-out format. Any subsidy funds that are not spent within 90 days from the date the funds were issued will be removed from the card. The unused funds removed from the account after 90 days will not be re-issued (see Administrative Rule DCF 201.04 (3)).

If a local agency receives a contact from a parent regarding expired funds, inform the parent of the policy on expiration of funds after 90 days and that the funds will not be reissued (see Section 2.5.6).

A report exists in Webl for local agencies that captures cases that had funds expire each month. The report is titled "Expungement" and is located in Webl at: DCF/WISDOM/Childcare/Subsidy – MyWIChildCare/BPI/Payment Reports. Further information regarding the Expungement report can be found by clicking on the Microsoft Word document labeled "Expungement". The document is in the same folder location as the actual report.

Example: A parent receives their first subsidy load on March 1 for \$300. They use \$250 of the \$300 for March. On April 1, they receive their next subsidy load of \$300. Their total balance at this point is \$350 (\$50 from March, and \$300 from April). When the parent issues their next payment to the provider, the amount will be taken out of the April funds, rather than the remaining March funds. In order to access the remaining March funds, the parent will have to use all of their April balance first.

If the parent makes a \$325 payment, \$300 will be removed from the April balance, and \$25 will be removed from the remaining March balance. This will leave \$25 remaining from the March funds. If the parent does not use the March funds, by June 1 (90 days after issuance) these funds will be removed from the card.

Funds that are unused for three or more months should result in the pending of the case in order to contact the parent to determine if the parent wishes to update the authorization based on the current child care need.

3.3.1.4 Overpayment to Providers

If the parent discovers that they have overpaid their provider, the parent should first discuss the payment discrepancy with their provider. The parent should determine how the error occurred, and how to handle the overpayment. If the parent has paid the wrong provider, or wrong provider location, the parent should notify the local agency.

Providers may not return any Wisconsin Shares funds to parents. If a provider is overpaid, the funds must be returned to the Wisconsin Shares program. For procedures on how providers can voluntarily return funds, see Section 4.12.1.1.

Note: If a provider believes they have been overpaid, the provider should contact their local agency to discuss why this may have occurred, and how the provider may voluntarily return those funds in order to prevent a potential client overpayment.

3.3.1.5 Payment Disputes

The Department and local agencies are not responsible for resolving payment disputes. Payment disputes must be resolved by the parent and provider.

3.3.2 Payment Policies

Parents are responsible for communicating with their child care provider on payment procedures and expectations. Below is a required list of information that parents should obtain about their provider's policies (see the requirement for a written payment agreement between the provider and parent in Administrative Rule DCF 201.038(5)).

3.3.2.1 Establish the Cost for Child Care

Parents are responsible for knowing their provider's child care prices (weekly/biweekly/monthly) and the parent's monthly subsidy amount. The Wisconsin Shares subsidy amount may not cover the entirety of the providers' price. The difference between the parent's subsidy amount and the provider's price is referred to as the "Parent Share". Parents are responsible for paying all additional costs not covered by the Wisconsin Shares subsidy.

Note: Refer parents and providers with payment concerns to the provider/parent written payment agreement. The DCF-F-5224 is a voluntary form that providers may use to comply with the requirement in Administrative Rule DCF 201.038(5) (a) for providers to have a written payment agreement with each parent of a child receiving child care subsidy.

Example: Steve receives \$300 a month in Child Care subsidy. His child care provider has a price of \$400 a month. Therefore, Steve is responsible for paying the difference of \$100 every month. The decision of when Steve will pay his Parent Share costs should be discussed and decided upon by Steve and his child care provider.

3.3.2.2 Establish Frequency of Payments

Parents and providers should determine the timing and frequency of payments. This includes whether the parent should pay in advance for child care services, or pay retroactively; and how often the parent will pay the provider (such as monthly, biweekly, or weekly).

Note: This information is required to be contained on the provider's written payment agreement. DCF-F-5224 is a voluntary form that providers may use to comply with the requirement in Administrative Rule DCF 201.038(5) (a) for providers to have a written payment agreement with each parent of a child receiving child care subsidy.

3.3.2.3 Maintain Receipts and Records

Parents should maintain receipts and confirmation numbers for each payment transaction made, and document the time period or date range for which the payment was made. This practice will assist with payment disputes that may arise between parents and providers, or any concerns regarding account balances.

Note: At no point can a provider require a parent to disclose the parent's subsidy amount to the provider. If this occurs, refer the parent to report fraud to the Child Care Fraud Mailbox at: (dcfmbchildcarefraud@wisconsin.gov).

3.3.2.4 Do Not Share the MyWIChildCare Card, Account Number, and/or PIN Parents should not provide access to, share, or give their MyWIChildCare EBT card, account number, or PIN to a provider, or any other unauthorized individual. See <u>Section 4.5.5.3</u> for penalties associated with the sharing of a MyWIChildCare EBT card, account number, or PIN (see <u>DCF 201.04(4)</u>).

Note: Department and local agency staff may not disclose a parent's subsidy balance with any individual other than the parent, unless it meets the criteria established in Section 3.3.7.

3.3.3 Responsibilities to the Department

By participating in the Wisconsin Shares Child Care Subsidy Program, parents agree to follow all of the policies and procedures associated with the program, as established by the Department.

3.3.3.1 Reporting Changes to Authorization

Parents must report changes to their local agency that may affect eligibility or impact the authorization within 10 calendar days after the change. See <u>Section 1.8.1</u> for a full list of reporting requirements.

3.3.3.2 Reporting Change of Provider

In order to change providers when the situation does not meet hardship criteria (see <u>Section 2.4.9.1</u>), and the funds were not authorized to the incorrect provider, a parent must notify their local agency prior to the last business day of the current month to have a new authorization effective the following month. If a parent changes providers in the middle of a month for a reason that does not meet hardship criteria, the parent is responsible for paying their new provider until the following month when their authorization to the new provider begins.

Any cases that are being reviewed for a possible hardship authorization must be documented in CSAW on the "*Hardship*" page (see Chapter 4 for instructions on processing hardship requests).

If it is discovered that a parent has misrepresented a hardship need, sanctions may be issued to the client, including an Intentional Program Violation (IPV). For additional information regarding hardship policy sanctions see <u>Section 4.5</u>.

Example 1: Today is November 4. Tony calls and wants to change his provider starting November 15. Tony does not meet hardship criteria. End the current authorization on November 30. Start the authorization to the new provider on December 1. Tony will have to pay his new provider out of pocket from November 15 – November 30 or postpone changing providers until the end of the month.

Example 2: Today is November 15. Lupe requests to switch providers starting December 16. End the current authorization December 15. Enter the new authorization starting December 16. When Lupe's account is loaded on December 1, it will have funds for her current provider from December 1- December 15, and funds for her new provider from December 16 - December 31.

Note: If funds were erroneously loaded to a MyWIChildCare EBT card because of either a local agency error or client error, authorizations can be corrected for the current month using the Post Load Benefit Correction (PLBC) module in CSAW. If appropriate, a new authorization can be created to a new provider for the current month (see Section 2.4.9). An overpayment may be assessed if the funds were issued to the incorrect provider. See Section 4.5 and 4.11 for overpayment information.

Note: Any funds remaining from the previous provider cannot be transferred to pay another provider or provider location.

3.3.4 Lost or Stolen Cards

Lost or stolen MyWIChildCare EBT cards must be reported immediately to FIS Customer Services at 1-877-201-7601. FIS will suspend the account and send a new EBT card. The newly-issued card will be attached to the same account and any remaining funds will automatically be loaded onto the new EBT card.

Any lost or stolen EBT cards may be subject to further investigation. For example, if the previous card's balance was \$0.00, and the parent claims that they had remaining funds on the card, the case should be referred for investigation either to the local agency fraud unit or to the BPI. In instances in which PLBC is used to adjust the subsidy amount on the EBT card when it is lost or stolen, the local agency may contact the BPI for assistance through the online BPI Technical Assistance Form at https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form

Note: If an EBT card is lost due to a hardship (such as a fire), the parent should contact their local agency to update their new address, and to request a replacement EBT card.

3.3.4.1 Subsidy Fund Replacement

If a MyWIChildCare EBT card is lost or stolen and the loss is not reported immediately, any lost subsidy funds during the time period where it was not reported will not be replaced. Subsidy funds will be replaced if the funds are depleted after the parent reports to the local agency or FIS Card Customer Service that the EBT card has been lost or stolen, or due to system errors or malfunctions.

If there is a situation where subsidy funds need to be replaced, contact the Child Care Subsidy and Technical Assistance Line (childcare@wisconsin.gov) or the BPI Technical Assistance Form at https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form.

3.3.5 Parent Inappropriate Use of Funds

Parents are accountable for the use of their Wisconsin Shares Child Care subsidy and MyWIChildCare EBT card. The subsidy funds may only be used to pay for child care services as described in Wisconsin Shares state statutes, administrative rules, and policy, and as noted on the authorization notice (see Administrative Rule DCF
201.04(1)). Inappropriate use of the subsidy may result in a sanction including overpayment and/or IPV.

Examples of inappropriate use of the subsidy funds include, but are not limited to:

- The parent asking a provider to cash out or "gift" subsidy funds to them in the form of a "kickback".
- The parent accepting a cash refund for any portion of their child care subsidy from a provider (see Administrative Rule <u>DCF 201.04(4)</u>).
- Giving a provider, or other unauthorized individual, the parent's MyWIChildCare EBT card, account number, or PIN.
- Using the subsidy to pay a provider who has not provided child care for the authorized children and will not provide care of these children within the month.
- Using an authorized child's subsidy funds to pay for another child's care (regardless of whether the other child is authorized or unauthorized).
- A provider using subsidy funds (as a recipient) to pay themselves as a provider.
- Issuing payment to an incorrect provider.
- Continuing to issue payment to a provider when there is no intention of utilizing the care of the provider.

Note: Sanctions for each of these actions are established in Chapter 4.

3.3.6 Parent Portal

The MyWIChildCare Parent Portal (https://MyWIChildCareparents.wisconsin.gov) allows parents to view information about their authorization(s), including authorized children, authorization history, and account balance. In order to log in to the Parent Portal, parents may utilize their existing ACCESS username and password. A computer based training for parents regarding the Parent Portal is available at https://dcf.wisconsin.gov/elearning/mwcc-parentportal/story_html5.html

3.3.7 Confidentiality for Parents

No person may disclose information about a parent or any investigation that may occur to anyone for any purpose not connected with the direct administration of the Wisconsin Shares program, except for a disclosure of information to the Department of Revenue. Penalties for unauthorized release of a parent's information may include a fine of \$25 to \$500 or imprisonment from 10 days to one year, or both [Wisconsin Statute 49.83].

Note: This includes that parent and/or authorization information (such as subsidy amount and the clients' authorized hours) should not be shared with their child care provider.

3.3.8 Personal Rights for Parents

As detailed in Wisconsin Statute <u>49.81</u>, all public assistance and relief granting agencies are required to respect the following rights of recipients of public assistance:

- The right to be treated with respect.
- The right to confidentiality of local agency records and files.
 - o Federal law allows for the use of records:
 - To locate a person or the assets of a person:
 - Who failed to file tax returns
 - Who underreported taxable income
 - Who is a delinquent taxpayer
 - For identifying fraudulent tax returns
 - Providing information for tax-related prosecutions
 - Auditing or accounting purposes to the extent permissible under federal law
- The right to access records and files relating to the parent or recipient's case.
 The local agency may withhold information obtained under a promise of confidentiality to the provider of the information.
- The right to a speedy determination of eligibility for public assistance, to notice of any proposed change in such eligibility, and, in the case of assistance, to a speedy appeal.

If agencies have questions or concerns about disclosure, they may contact the DCF Office of Legal Counsel for assistance.

Note: The method used to verify information when determining eligibility must not violate the parent's rights, privacy or personal dignity.

3.3.9 Parent Concern Triage InformationConsult the table below to determine whether a parent's question should be referred to FIS.

| Local Agency | FIS |
|--|----------------------------------|
| Subsidy Amount | Activating EBT card |
| Subsidy availability date | Selecting/changing PIN |
| Parent cannot provide authentication to FIS and needs case number or CWW PIN for activating and selecting MyWIChildCare EBT card PIN | Damaged, stolen, lost EBT card |
| Eligibility/authorization changes | Emergency EBT card issuance |
| EBT card deactivated or cancelled | www.ebtEDGE.com issues |
| EBT card undeliverable because of address change or incorrect address | IVR (phone) issues |
| Subsidy Benefit expiration date | Balance and/or History Questions |
| Change Provider, Pay Wrong Provider | |

3.4 Provider EBT Information

3.4.1 Provider Requirements to Participate

There are various criteria that must be met for a provider to accept MyWIChildCare payments (as outlined in Chapter 2.1).

3.4.2 Provider Payment Procedures

3.4.2.1. FIS Agreement

Providers that wish to participate in MyWIChildCare must contact FIS Merchant Services at 1-800-894-0050 to receive their FIS contract. The agreement must be completed and returned to FIS.

Note: Providers who participate in YoungStar will automatically receive an FIS agreement.

Providers may complete the agreement online at the ebtEDGE Provider Portal or contact FIS directly for a paper copy. FIS will provide a paper copy to the provider if it is requested.

The FIS agreement will require the following information:

- The Provider's Federal Tax ID or Social Security Number
- Debitable checking or debit account routing number

After the agreement application has been completed, the Department will assign the provider an "FIS Provider Identification Number" that will be sent to FIS in a daily batch. The Department will communicate the FIS Provider Identification Number to the provider.

3.4.2.1.1 Checking Accounts

Providers must have an active checking account or account that can be debited in order to receive payments from MyWIChildCare EBT cards. Providers who do not have a checking account and are unable to obtain one will follow the "unbanked" provider policy.

Some providers may not be able to obtain a checking account. All providers who wish to receive Wisconsin Shares payments should make all reasonable efforts to obtain a checking account. If a provider is unable to establish a checking account, the provider may receive Wisconsin Shares payments via a reloadable debit card offered through several companies. The account or card number will be required on the FIS agreement.

3.4.2.2 Obtaining a Point of Sales (POS) Terminal

Providers may request a Point of Sale (POS) terminal while completing the FIS Agreement. POS terminals will be available for lease from FIS for a monthly fee of \$14.50 (fee subject to change). If a provider would like to either obtain a POS terminal

after submitting the agreement or return their POS terminal, they may contact FIS Customer Services at 1-877-201-7753.

If a provider selects to lease a POS, they will be required to complete POS Training and a POS Contract from FIS.

3.4.2.3 Prior to First Payment

Prior to receiving a newly authorized parent's first payment, the provider should ensure that the parent has been authorized to the correct provider location. This will ensure accuracy of payment and decrease the chances for an overpayment.

Verify the authorization via:

- 1. Monthly Authorization Letter: Lists all current, future, backdated, and deleted authorizations. These letters are mailed to providers on the last business day of each month. If the child is authorized to begin care in the next month, the child's name will be included in the next month's authorization letter. If the child's name is not listed for their next month's authorization, the provider should alert the parent, who should contact the local agency.
- 2. Child Care Provider Portal (https://mywichildcareproviders.wisconsin.gov/login): The Child Care Provider Portal contains information on the provider's facility(ies), regulation details, prices, authorizations, contact information, YoungStar quality adjustments, documents, messages, background check request page and other links. The provider can view authorizations for their center(s) in real-time. If the provider sees that the child is authorized for their location, the parent may move forward with the payment. If the provider cannot see the child, the parent must contact the local agency.
- ebtEDGE (http://www.ebtedge.com/): This website is operated by FIS and contains provider transaction information and the online FIS Agreement for completion.

If the local agency is notified that a child is not authorized to the correct provider location, the worker must end the current authorization to the incorrect provider as of the last day of the current month, assess for a potential overpayment, retraction, or Voluntary Repayment Agreement (VPA) if a payment was made to the incorrect provider, and create a new authorization to the correct provider in CSAW. See Section 4.5 and 4.11 for overpayment policies.

3.4.2.4 MyWIChildCare EBT Payments for Providers

After the parent completes the child care payment through any of the processes described in Section 3.3.1.2, the payment amount will be electronically transmitted to the provider's bank account or loadable card within 2–3 business banking days. The provider will be able to see payment transactions in real-time on ebtEDGE.com to verify payments are in progress. If there is a discrepancy with the amount deposited into the

provider's account, or if the provider wishes to confirm the amount of the transfer, they should contact FIS Customer Services at 1-877-201-7753 or log in to ebtEDGE.com.

3.4.2.5 YoungStar Quality Adjustments

<u>YoungStar</u> is Wisconsin's child care quality rating and improvement system. Child care facilities are rated on a 1-5 Star scale and only those with a 2 Star or higher rating are eligible for authorizations. The child care program's rating is then used to calculate the YoungStar adjustment amount (see <u>Section 2.5.4</u> for <u>YoungStar adjustment</u> details).

The YoungStar ratings will be processed on the 15th of every month. The local YoungStar office will have until the 25th of each month to activate any ratings. The rating will be effective the first day of the following month. The YoungStar adjustment will be issued to the providers through FIS on the first of every month. The provider can view their YoungStar adjustments that have been deposited each month on ebtEDGE.com and a list of YoungStar adjustments identified by month and individual child on the Provider Portal.

If a parent is issued an authorization during the middle of the month, the YoungStar adjustment will be generated to the authorized provider within 24 hours.

Note: YoungStar recoupments/overpayments are discussed in sanctions (see <u>Section 4.11</u>).

3.4.2.6 Reviewing Deposits

There are three options available to providers if they wish to review a deposit. The provider may review a deposit though ebtEDGE.com, the IVR telephone system, or the Provider Portal. Each of these processes is described below.

Reviewing Deposits through ebtEDGE

- 1. Log in www.ebtEDGE.com.
- 2. Sign in using the Provider ID and password.
- 3. Transaction history is available on the landing page.

Reviewing Deposits by IVR Telephone

- 1. Call FIS Provider Customer Service at 1-877-201-7753.
- 2. Select Language.
- 3. Enter the FIS Provider ID.
- 4. Continue following the prompts to receive the desired information.

Reviewing Deposits through the Provider Portal

- 1. Log in to the Provider Portal (http://mywichildcareproviders.wisconsin.gov).
- 2. Select the appropriate location (if more than one).
- 3. Select the Authorizations button.

3.4.2.7 Overpayments by Parent to Provider

If the provider is overpaid by a parent, the provider should make arrangements with the parent to reconcile the difference, according to the provider's payment policies. However, providers must not return any form of payment including cash to the parent from the child care subsidy amount (see Administrative Rule DCF 201.04(4)). This is referred to as cashing out the subsidy funds or a "kickback" in which a provider returns a portion of the subsidy funds (or other item of value) to the parent, which may result in a sanction (see Section 4.5 or 4.11). The provider should return any overpaid Wisconsin Shares funds to the Department through a Voluntary Repayment Agreement (see Section 4.12.1.1 for details).

Example: A parent pays their provider at the beginning of a month for the entire month. The parent decides to change providers in the middle of the current month. The parent requests a refund for their unused funds. Their provider's payment policy allows this. However, providers are not allowed to refund a parent's unused Wisconsin Shares subsidy to the parent. The provider may return all or part of the Parent Share if that is a part of the providers' policy. The provider should contact their local agency to return the overpaid Wisconsin Shares funds.

If the local agency becomes aware of this action, a referral should be opened in BRITS and investigated. An overpayment and/or IPV may be issued to the provider and/or client for this situation.

3.4.3 Provider Responsibilities

Providers should treat parents who receive a subsidy the same as their private pay parents. Providers who fail to meet requirements in policy or administrative rule DCF
201 may be subject to enforcement actions including forfeiture.

3.4.3.1 Establish and Communicate Child Care Prices

It is the responsibility of the provider to establish child care prices, to report their prices to their local agency, and to communicate these prices to parents.

Note: Information on the provider's child care price must be contained on the provider's written payment agreement with the parent. DCF-F-5224 is a voluntary form that providers may use to comply with the requirement in Administrative Rule DCF
201.038(5) (a) for providers to have a written payment agreement with each parent of a child receiving child care subsidy.

3.4.3.2 Determine Frequency of Payments

The provider and parent should establish expectations regarding the frequency of payments. The provider should determine, in agreement with the parent, whether the provider will require payment proactively or retroactively, and how often they would like payments (monthly, weekly, biweekly, etc.).

Note: Information on frequency of payments must be contained on the provider's written payment agreement with the parent. DCF-F-5224 is a voluntary form that providers may use to comply with the requirement in Administrative Rule DCF
201.038(5) (a) for providers to have a written payment agreement with each parent of a child receiving child care subsidy.

3.4.3.3 Written Payment Agreement

Providers are required by Administrative Rule <u>DCF 201.038(5)</u> to have a written payment agreement with each parent that receives a child care subsidy for child care by the provider.

The written payment agreement between the provider and parent must include **all** of the following:

- The provider's monthly or weekly child care price.
- The provider's days and hours of operation.
- Any discounts or scholarships that are available to parents, and any discounts or scholarships that the parent is receiving.
- The parent's payment schedule.
- The provider's anticipated closure dates.
- Payment expectations for the child's anticipated and unanticipated absences and the provider's closure dates.
- Parent procedures for termination of a child's enrollment.
- Provider procedures for termination of a child's enrollment.

Note: DCF-F-5224 is a voluntary form that providers may use to comply with the requirement in Administrative Rule DCF 201.038(5) (a) for providers to have a written payment agreement with each parent of a child receiving child care subsidy.

3.4.4 Provider Inappropriate Use of Funds

Providers participating in Wisconsin Shares agree to receive child care subsidy funds from parents only for child care services provided. Any inappropriate activity or use of these benefits may result in further sanctions (see Administrative Rule DCF 201.04(1)).

Some examples of a provider's inappropriate use of child care subsidy funds include (but are not limited to):

- Cashing out subsidy funds for a parent (Kickbacks).
- Refunding any amount of the child care subsidy to a parent (see Administrative Rule DCF 201.04(4)).
- Collecting and/or using the parent's MyWIChildCare EBT card, account number, and/or PIN, or any representation of these items (see Administrative Rule <u>DCF</u> 201.038(7) (d)).
- Using the Child Care subsidy (as a recipient) to pay themselves (as a provider).

- Receiving subsidy funds for child care provided for a child(ren) that the funds were not intended for (see Administrative Rule DCF 201.04(1)).
- Requesting subsidy payment for a child who has not attended for more than 30 days.

Note: Additional information on what qualifies as Wisconsin Shares violations, overpayments, and sanctions, see Sections <u>4.5 and 4.11</u>.

The <u>Child Care Provider Portal</u> (<u>https://MyWIChildCareproviders.wisconsin.gov</u>) allows providers to access information regarding their facility, authorizations, and other documents. This includes:

- Facility details such as FIS Provider ID(s), physical address(es), etc.
- Regulation details (including history)
- Provider prices used for authorization calculation in CSAW
- · Child care authorizations
- Contacts (phone, address, and email information for the licensor/certifier and the YoungStar technical consultant assigned to the program if applicable).
- YoungStar Details (including history)
- YoungStar Quality Adjustments (4 and 5 Star programs)
- Documents (provider authorization notice and FIS enrollment letter)
- Messages (previously announcements)
- External links (Regulated Child Care and YoungStar, FIS ebtEDGE Provider Portal, Child Care Registry, and CCR&Rs)

Note: Computer-based training on the Child Care Provider Portal is available on the For Providers tab on the MyWIChildCare homepage (https://dcf.wisconsin.gov/mywichildcare/providers). An additional training video is available in the Child Care Provider Portal.

3.4.4.1 Accessing the Child Care Provider Portal

The Child Care Provider Portal uses the same security clearance as the previous CCPI system. Providers who previously had access to CCPI had their security clearance transferred to the Provider Portal. Any providers who did not have access to CCPI and who would like to gain access to the new portal must complete the CCPP application process explained on the Gaining Access to the Child Care Provider Portal web page at: https://dcf.wisconsin.gov/childcare/provider-portal/ccpp-access.

The local agency can request access to the Child Care Provider Portal using the following form: https://dcf.wisconsin.gov/files/forms/doc/13358.docx

3.5 Contact Information

The local agency may use the following contacts for assistance and reporting measures.

| Issue | Reasons | Who to Contact | Contact Information |
|---|---|--|---|
| For EBT Activating EBT Card FIS Assistance Selecting or Changing a PIN | | FIS Customer Assistance Helpline (for Clients): (877) 201-7601. | |
| | Damaged, Lost or Stolen EBT Cards | | 2. FIS Provider Assistance Helpline (for Providers): (877) 201-7753. |
| | POS Issues www.ebtEDGE.com | | 3. FIS Merchant Services Helpline (for Providers regarding an FIS agreement): |
| IVR | Issues IVR (Automated Telephone) Issues | | (800) 894-0050. 4. Customer Assistance Website: www.ebtEDGE.com |
| Assistance Authorization Questions Coordinator With your question prior to contacting the Child Care Help Desk. Coordinator With Your Question Prior to Contacting the Child Care Help Desk. | 1) BRO Coordinator | Bureau of Regional Operations https://dcf.wisconsin.gov/files/regionalop erations/pdf/bro-contacts.pdf , or BROCCPolicyHelpDesk@wisconsin.gov | |
| | contact your BRO coordinator with your question prior to contacting the Child Care Help Desk. | 2) Child Care Help Desk | Child Care Help Desk: ChildCare@wisconsin.gov Child Care Help Desk line: (608) 422-7200 |
| | Collection Questions | PACU | PACU helpline: (800) 943-9499 PACU Assistance Mailbox: dwspacu@wisconsin.gov |
| | Legal Questions | OLC | DCFCalLegal@wisconsin.gov |
| | Provider or Client Investigation, or Sanction Questions | BPI | https://dcf.wisconsin.gov/progintegrity/bpi-technical-assistance-form |
| | YoungStar Questions | YoungStar | youngstar@wisconsin.gov |
| | Background Check Questions | Bureau of Early Care Regulation (BECR) | dcfplicbecrcbu@wisconsin.gov |

| | BRITS Questions | | Security or Technical Questions: DCFServicedesk@wisconsin.gov For policy questions: https://dcf.wisconsin.gov/progintegrity/bp i-technical-assistance-form |
|------------------------|----------------------------------|-----|--|
| For Fraud Reporting | Parent and Provider Referrals | BPI | Parent and Provider Referrals: 1. The DCF fraud mailbox: dcfmbchildcarefraud@wisconsin.gov 2. The DCF fraud hotline: (877) 302-3728 3. Submit the Report Child Care Fraud Form 4. Writing to: Department of Children and Families Bureau of Program Integrity PO Box 8916 Madison, WI 53708-8916 |